DARIUS WADIA

ATTORNEY AT LAW

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MEMO ENDORSED

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December 5, 2011

VIA FAX (212) 805-7949

The Honorable P. Kevin Castel United States District Judge United States District Court Southern District of New York 500 Pearl Street New York, New York 10007

Mr. Moutin shall respond by fox to Chabers me later than December 21, 2011. 50 ORDERED USD5 Donald Ellis, Robin Sampson, and Arlander Wilson v. The City of New York, et al. /2 -/6-// Re: Case number 11 Civ. 3707 (PKC)

Your Honor:

I represent all three plaintiffs in the above-referenced case. I am writing pursuant to Local Civil Rule 37.2 to request an informal conference with the Court in order to raise various discovery disputes with Assistant Corporation Counsel Gregory Mouton, Jr., who is the attorney for the defendants.

Specifically, my office served the defendants with the Plaintiffs' First Set of Interrogatories and Request for Production of Documents on September 29, 2011. Although more than 30 days have passed since their service, I have not received any written responses. Despite my many efforts (including calls, emails and a hand-delivered letter) to resolve this matter short of judicial intervention, all I have received were unfulfilled promises that the responses were forthcoming.

Thank you for you consideration of this matter.

Respectfully submitted,

Darius Wadia (DW 8679)

Copy (via email): Assistant Corporation Counsel Gregory P. Mouton, Jr.